

May 17, 2020
Joel Schneider, USMJ
United States District Court
District of New Jersey
Vicinage of Camden
1 John F. Gerry Plaza
4th and Cooper Streets
Camden, NJ 08101

RE: McBride v. Washington Township 1:19-cv-17196

Dear Judge Schneider,

As the Plaintiff Pro Se, I received James Birchmeier's opposition to Plaintiff's Motion for Leave Amend Document 13, Plaintiff's Motion for Summary Judgment against Defendant Washington Township. Mr. Birchmeier's opposition is docketed with the court as Document 130.

Contained with document 130 are certain representations by Mr. Birchmeier about the "pool lawsuit," formally known as Township of Washington v. McBride GLO-DC-002-18. I noticed those representations are completely different from those representations made by Mr. Kelly and Mr. Scheuerman, counsel for Defendants Carmen Saginario and Capehart and Schatchard, PA. Neither of the two representations matches up with the record in the entire docket for GLO-DC-002-18.

Therefore, please find enclosed a letter request addressed to Barbara Browning team leader for the Courtroom of the Honorable Samuel Ragonese. The request seeks the full record of proceedings in "Township of Washington v. McBride; GLO-DC-002-18).

I hope to prove that Counsel for each of the Defendants have intentionally misled Your Honor and this Court.

Very truly yours,

Dr. Brian McBride
Plaintiff Pro Se

May 17, 2020
Ms. Barbara Browning
Civil Division Case Manager
Superior Court of New Jersey
Gloucester County Vicinage
Chambers of Honorable Samuel Ragonese, JSC
1 North Broad Street
Woodbury, NJ 08096

RE: Township of Washington v. McBride GLO-DC-002-18
In Re: McBride v. Washington Township et al. 1:19-cv-17196 (formerly GLO-L-871-19)

Dear Ms. Browning,

As you are aware from our telephone conversation, I was the Defendant in the above, referenced case. After the case was settled before Judge Ragonese, I was given information and evidence that shows Washington Township and its attorney committed fraud in and upon Judge Ragonese's Court. I subsequently sued Washington Township and its attorney, Carmen Saginario for, inter alia, damages related to the parties' fraud upon Judge Ragonese's Court. I write here to request a full copy of all records (written, audio, and/or video) in the Court's files for Township of Washington v. McBride (GLO-DC-002-18).

Defendant Washington Township, with the consent of Counsel for Defendant Carmen Saginario and Defendant Capehart & Scatchard, PA removed my SLAPP-back lawsuit to Federal District Court where they have filed a Motion to Dismiss under Federal Rules of Civil Procedure Rule 12. I subsequently filed a Motion for Sanctions under FRCP Rule 11.

A part of the reason for the Motions for Sanctions under Rule 11 is because the attorney for Washington Township, on the one hand, and the attorney for Carmen Saginario, Esq. have both made material misrepresentations about the case (GLO-DC-002-18) in their papers before the United States District Court relative to the documents in my possession and my personal appearances before Judge Ragonese. What is even worse is that representations made to Judge Joel Schneider by attorneys for Carmen Saginario is completely different than the representations made by Counsel for Washington Township.

Accordingly, and pursuant to the Rules of the New Jersey Court, I respectfully, request a full copy of the record prepared for me to submit to the Federal District Court in McBride v. Washington Township et al.

Very Truly Yours,

Dr. Brian McBride
Plaintiff Pro Se
86 Goodwin Parkway
Sewell, NJ 08080